

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

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| In Re: Scott H Blumsack dba Mass |) | Case No. 21-40248 CJP |
| Athletics, LLC |) | Chapter 13 Proceeding |
| Debtor |) | May 3, 2021 |

OBJECTION TO CONFIRMATION OF PLAN

MATRIX FINANCIAL SERVICES CORP., (the “Creditor”), holds a security interest in the Debtor’s real property known as 2 Old Homestead Road, Groton, Massachusetts 01450, and hereby objects to confirmation of the Debtor's Chapter 13 Plan dated April 26, 2021 (the “Plan”), in connection with the above referenced matter for the following reason:

1. The Plan does not provide for payment of the Creditor’s pre-petition mortgage arrearage estimated to be \$42,245.84, with an estimated total debt of \$435,215.04. The Creditor anticipates filing its Proof of Claim on or before the bar date of June 10, 2021.

Wherefore, the Creditor requests the Court deny confirmation of the Debtor’s Chapter 13 Plan, or for such other relief as the Court deems appropriate.

By /s/ Richard T. Mulligan
Richard T. Mulligan
The Creditor’s Attorney
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CERTIFICATION OF SERVICE

I hereby certify that on this __3__ day of May, 2021, a copy of the foregoing was served to the following:

Scott H Blumsack dba Mass Athletics, LLC
Debtor
2 Old Homestead Rd.
Groton, MA 01450
Via First Class Mail

Dmitry Lev, Esq.
Debtor's Attorney
Via Electronic Notice of Filing

Denise M. Pappalardo, Esq.
Trustee
Via Electronic Notice of Filing

U.S. Trustee
Office of the U.S. Trustee
Via Electronic Notice of Filing

By /s/ Richard T. Mulligan

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